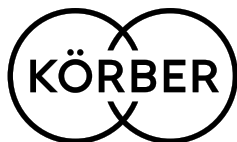


Corporate Guideline Code of Conduct

Contact: Compliance Board

Status as of: 1. January 2020



According to the “Fundamentals and Corporate Values of the Körber Group” it goes without saying that we abide by the applicable laws and provisions everywhere in the world. The Executive Board of Körber AG is convinced that sustainable financial success is intrinsically tied to compliance with these fundamentals and corporate values. These, and the following code of conduct must therefore be characteristic of our conduct towards our business partners and employees, as well as society and the environment in all countries where we operate. For this reason, all employees, directors and officers, and group companies of the Körber Group are obligated within the scope of their activities to observe all applicable laws and high ethical standards. The Körber Group thereby orients itself in particular to the United Nation’s “Universal Declaration of Human Rights” and principles of its “Global Compact”.

1. Scope of application and employee responsibility

This code of conduct is binding for all employees, directors and officers, and companies of the Körber Group, hereinafter referred to as employees.

2. Ethical conduct and compliance with applicable law

Each employee is obligated to observe high ethical standards and all applicable national and international laws. In all activities and business relationships, each employee is to act in a fair, respectful and trustworthy manner and uphold and promote the image of the Körber Group.

Each employee is obligated to respect human rights and to actively support their protection. Every employee must ensure that they are not involved in any human rights violations

All forms of discrimination, abuse or other unrighteous conduct are impermissible – whether this be due to gender, age, race, skin color, ethnic or national background, religion, convictions, sexual identity or orientation, marital status, disability or any other characteristic protected by law.

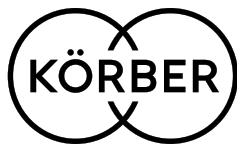
Any form of child or forced labor is prohibited, as are working conditions or forms of treatment that violate national laws and international agreements. The freedom of association and the right to collective bargaining must be recognized.

3. Environmental protection

Environmental protection is a high priority for the Körber Group. This is why we handle resources and pollutants in a responsible manner and take the development and prevalence of environmentally friendly technologies into account.

4. Protecting corporate assets

Each employee has an obligation to protect corporate assets from abuse and loss. As a matter of principle, corporate assets may only be used for business purposes unless private use is authorized. Each employee is also obligated to protect the intellectual property of the Körber Group, e.g. patents, brands and expertise, from attacks or loss. The intellectual property of others is to be respected.



5. Handling information

Business secrets and other sensitive information are to be handled confidentially and protected from disclosure to unauthorized persons. This also applies for inventions and other expertise. Employees that have access to business secrets and other sensitive information may not pass them on to third parties without authorization or use them for purposes other than business purposes.

Business documents and IT systems are to be protected from unauthorized access by third parties. Personal data may only be collected, used and stored according to the applicable data protection regulations.

6. Competitive conduct

Antitrust law is intended to secure and maintain free and genuine competition in the interest of all market participants.

Each employee is thus obligated to observe the applicable antitrust laws and other laws intended to regulate competition.

7. Corruption

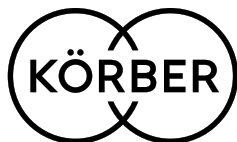
Corruption, including extortion and bribery, is rejected in any kind of business dealings both domestically and abroad. We shall forego a business transaction and the achievement of internal targets if such can only be achieved by breaking the law. The following are prohibited in particular:

- Offering, promising or granting a domestic or foreign officeholder a personal, financial or other advantage for the performance or omission of an official act
- Offering, promising or granting members or representatives of domestic or foreign companies personal, financial or other advantages
- Allowing acts of corruption to be carried out with the help of others, e.g. with the help of relatives, friends, dealers, advisors or brokers
- Supporting the illegal actions of other individuals
- Encouraging or accepting personal, financial or other advantages from business partners or their employees.

Gifts and invitations within the scope of business relationships with business partners that stay within the framework of common business hospitality, customs and politeness and do not violate any laws are exempted from the above bans.

8. Conflicts of interest

The employees of the Körber Group are obligated to avoid activities that could lead to a conflict of interest. As a matter of principle, there is to be no awarding of contracts to closely affiliated individuals (e.g. spouses, domestic partners, relatives and friends) or to companies at which closely affiliated individuals are employed in a key function or in which they hold a significant share or for which they act as our negotiation partner.



9. Combating money laundering

The Körber Group only works together with reputable business partners that act within the guidelines of legal regulations and do not use illegal funds. Each employee is obligated to comply with the laws against money laundering and immediately report suspicious moments that may indicate money laundering.

10. Adherence to export control and sanction regulations

Every employee must adhere to all regulations and laws that limit free trade between nations for security and foreign policy reasons. Export bans and limitations as well as sanctions against countries, organizations and persons, including limits in means of payment, must be strictly adhered to.

11. Implementation

The Körber Group will ensure that the code of conduct is observed in an active and ethically responsible manner. All employees of the Körber Group must support this code. Actions that do not comply with this code must be corrected immediately. Violations are subject to appropriate disciplinary measures that could lead to termination of the employment contract without notice and claims for damages.

Körber AG

The Executive Board